

1 UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK  
34 VIACOM INTERNATIONAL, INC., COMEDY )  
5 PARTNERS, COUNTRY MUSIC. )  
6 TELEVISION, INC., PARAMOUNT )  
7 PICTURES CORPORATION, and BLACK )  
8 ENTERTAINMENT TELEVISION, LLC, )  
910 Plaintiffs, )  
11

12 vs. )

13 NO. 07-CV-2103  
1415 YOUTUBE, INC., YOUTUBE, LLC, )  
16 and GOOGLE, INC., )  
1718 Defendants. )  
1920 THE FOOTBALL ASSOCIATION PREMIER )  
21 LEAGUE LIMITED, BOURNE CO., et al., )  
22 on behalf of themselves and all )  
23 others similarly situated, )  
24

25 Plaintiffs, )

vs. )

NO. 07-CV-3582  
2627 YOUTUBE, INC., YOUTUBE, LLC, and )  
28 GOOGLE, INC., )  
2930 Defendants. )  
3132 VIDEOTAPED DEPOSITION OF KENT WALKER  
33 PALO ALTO, CALIFORNIA

34 THURSDAY, DECEMBER 17, 2009

35 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CLR  
36 CSR LICENSE NO. 9830  
37 JOB NO. 18312  
38  
39  
40  
41  
42  
43  
44  
45

Figueira Decl. Tab

116

1 WALKER, KENT 116-0002

2 bullet point reads, "When YouTube receives a takedown  
3 notice or otherwise obtains knowledge of a clip that  
4 has eluded the filtering system, it should immediately  
5 remove not only the clip or full work in question, but  
6 all other versions or excerpts of the same copyrighted  
7 programming identified in the notice, in addition to  
8 hashing and fingerprinting the copyrighted work, to  
9 prevent future unauthorized uploads as discussed  
10 above."

11 My question is, did Google do that in  
12 February of 2007?

13 A In -- for some period of time previous to  
14 that, I don't know when it started, YouTube had a  
15 system called MD5 hashing, which identified unique  
16 copies of a given video, and when we received a DMCA  
17 notice for one version, I believe we would block other  
18 versions that also had that same hash, which is, by

19 the way, another example of a situation where we were  
20 removing or blocking items without having received the  
21 specific URL and, I believe, going beyond what the  
22 DMCA requires.

23 The other aspects of this question, it's --  
24 because the sentence is compound, the -- the question  
25 is derivatively compound, if you will, so it's a